

**FILED UNDER SEAL PURSUANT TO
PROTECTIVE ORDER**

Exhibit I

to the Declaration of Dat Nguyen in Support of
KAIFI's Motion for Leave to Amend
Infringement Contentions

From: Sheasby, Jason <JSheasby@irell.com>

Sent: Tuesday, February 23, 2021 4:10 PM

To: Curtis, Nathan R. <NCurtis@gibsondunn.com>; LTL-Kaifi-T-Mobile <LTL-Kaifi-T-Mobile@ltlattorneys.com>

Cc: Dat Nguyen <dat.nguyen@ltlattorneys.com>; Melissa Smith <melissa@gillamsmithlaw.com>; Michael Song <michael.song@ltlattorneys.com>; Enoch Liang <Enoch.Liang@ltlattorneys.com>; Robert Bunt <rcbunt@pbatyler.com>; ~Attaway, Deana <dattaway@pbatyler.com>; Kelsey Atkinson <kelsey.atkinson@ltlattorneys.com>; Matthew Hawkinson <mhawkinson@hycounsel.com>; Steve Chang <steve.chang@ltlattorneys.com>; *** TMUS-Kaifi_C <TMUS-Kaifi_C@gibsondunn.com>

Subject: Re: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

Dear Nathan:

The justification for the changes to the infringement contentions is that you asked us for additional detail about areas in which you felt there was deficiencies and we wanted to be responsive to those concerns.

We will be filing an opposed motion to amend our contentions.

Thanks

JS

From: "Curtis, Nathan R." <NCurtis@gibsondunn.com>

Date: Friday, February 19, 2021 at 9:08 AM

To: Jason Sheasby <JSheasby@irell.com>, "LTL-Kaifi-T-Mobile@ltlattorneys.com" <LTL-Kaifi-T-Mobile@ltlattorneys.com>

Cc: Dat Nguyen <dat.nguyen@ltlattorneys.com>, Melissa ~Smith <melissa@gillamsmithlaw.com>, Michael Song <michael.song@ltlattorneys.com>, Enoch Liang <Enoch.Liang@ltlattorneys.com>, Robert ~Bunt <rcbunt@pbatyler.com>, Deana Attaway <dattaway@pbatyler.com>, Kelsey Atkinson <kelsey.atkinson@ltlattorneys.com>, Matthew Hawkinson <mhawkinson@hycounsel.com>, Steve Chang <steve.chang@ltlattorneys.com>, *** TMUS-Kaifi_C <TMUS-Kaifi_C@gibsondunn.com>

Subject: RE: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

Counsel,

We disagree that there was no expansion of your infringement contentions, and consequently cannot consent to the supplementation absent justification, which we have requested. We would be happy to discuss further and meet and confer on this issue, but as it stands, given the lack of justification for expanding your theories of infringement, T-Mobile does not consent to the supplementation and would oppose a motion for leave to supplement the contentions. As you know, pursuant to P.R. 3-6, KAIFI's October 30, 2020 Infringement Contentions are KAIFI's "final contentions," unless KAIFI is granted leave to supplement. Please let us know if you still wish to proceed with the supplementation, including by motion seeking leave, and if so, we will be available to meet and confer with you.

Best,
Nathan

Nathan R. Curtis

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From: Sheasby, Jason <JSheasby@irell.com>
Sent: Tuesday, February 2, 2021 9:05 AM
To: Curtis, Nathan R. <NCurtis@gibsondunn.com>; LTL-Kaifi-T-Mobile@ltlattorneys.com
Cc: Dat Nguyen <dat.nguyen@ltlattorneys.com>; melissa@gillamsmithlaw.com; Michael Song
<michael.song@ltlattorneys.com>; Enoch Liang <Enoch.Liang@ltlattorneys.com>; ~Bunt, Robert
<rcbunt@pbatyler.com>; ~Attaway, Deana <dattaway@pbatyler.com>; Kelsey Atkinson
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Chang <steve.chang@ltlattorneys.com>; *** TMUS-Kaifi_C <TMUS-Kaifi_C@gibsondunn.com>
Subject: RE: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under
P.R. 3-1 to T-Mobile

[External Email]

Dear Nathan:

We do not believe there has been any expansion of the contentions. At no point in time did we every take the position that the location register must be a single unitary physical object nor did we take the position that the UE could not hold location information. If you believe this information is material to your invalidity contentions, you may supplement the contentions to address this information in a timely manner.

JS

From: Curtis, Nathan R. <NCurtis@gibsondunn.com<<mailto:NCurtis@gibsondunn.com>>>
Sent: Tuesday, February 2, 2021 7:00 AM
To: Sheasby, Jason <JSheasby@irell.com<<mailto:JSheasby@irell.com>>>; LTL-Kaifi-T-Mobile@ltlattorneys.com<<mailto:LTL-Kaifi-T-Mobile@ltlattorneys.com>>
Cc: Dat Nguyen <dat.nguyen@ltlattorneys.com<<mailto:dat.nguyen@ltlattorneys.com>>>; ~Smith, Melissa
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Subject: RE: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under

P.R. 3-1 to T-Mobile

Counsel,

Upon review, KAIFI's Supplemental Infringement Contentions improperly expand KAIFI's theories of infringement. For example, in its Supplemental Infringement Contentions, KAIFI for the first time contends that the "location register can be distributed across components in the system" and that location information "can be in part on the user equipment." See Supp. Inf. Cont. at 16–17, 35–36, 40, 44, 56, 64–65, 81, 85, 103, 110. These expanded theories are not responsive to the questions T-Mobile raised, as you asserted in your January 8, 2021 email. Please explain the basis for KAIFI's supplementation.

Best,
Nathan

Nathan R. Curtis

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From: Sheasby, Jason <JSheasby@irell.com<<mailto:JSheasby@irell.com>>>
Sent: Thursday, January 14, 2021 9:54 AM
To: Curtis, Nathan R. <NCurtis@gibsondunn.com<<mailto:NCurtis@gibsondunn.com>>>
Cc: Dat Nguyen <dat.nguyen@ltlattorneys.com<<mailto:dat.nguyen@ltlattorneys.com>>>; Dominguez, Kate <KDominguez@gibsondunn.com<<mailto:KDominguez@gibsondunn.com>>>; Hershkowitz, Benjamin <BHershkowitz@gibsondunn.com<<mailto:BHershkowitz@gibsondunn.com>>>; Kremer, Paul J. <PKremer@gibsondunn.com<<mailto:PKremer@gibsondunn.com>>>; Krevitt, Josh <JKrevitt@gibsondunn.com<<mailto:JKrevitt@gibsondunn.com>>>; melissa@gillamsmithlaw.com<<mailto:melissa@gillamsmithlaw.com>>; Michael Song <michael.song@ltlattorneys.com<<mailto:michael.song@ltlattorneys.com>>>; Enoch Liang <Enoch.Liang@ltlattorneys.com<<mailto:Enoch.Liang@ltlattorneys.com>>>; ~Bunt, Robert <rcbunt@pbatyler.com<<mailto:rcbunt@pbatyler.com>>>; ~Attaway, Deana <dattaway@pbatyler.com<<mailto:dattaway@pbatyler.com>>>; Kelsey Atkinson <kelsey.atkinson@ltlattorneys.com<<mailto:kelsey.atkinson@ltlattorneys.com>>>; Matthew Hawkinson <mhawkinson@hycounsel.com<<mailto:mhawkinson@hycounsel.com>>>; Steve Chang <steve.chang@ltlattorneys.com<<mailto:steve.chang@ltlattorneys.com>>>
Subject: Re: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

[External Email]
Sure.

Best

JS

On Jan 14, 2021, at 7:35 AM, Curtis, Nathan R.

<NCurtis@gibsondunn.com<<mailto:NCurtis@gibsondunn.com>>> wrote:

Jason,

We are still reviewing KAIFI's proposed Supplemental Disclosure of Asserted Claims and Infringement Contentions and will get back to you on whether we oppose a motion. It will expedite our review if you are able to send a redline showing the edits made.

Best,
Nathan

Nathan R. Curtis

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From: Sheasby, Jason <JSheasby@irell.com<<mailto:JSheasby@irell.com>>>

Sent: Wednesday, January 13, 2021 11:16 AM

To: Dat Nguyen <dat.nguyen@ltlatterneys.com<<mailto:dat.nguyen@ltlatterneys.com>>>; Curtis, Nathan R. <NCurtis@gibsondunn.com<<mailto:NCurtis@gibsondunn.com>>>; Dominguez, Kate <KDominguez@gibsondunn.com<<mailto:KDominguez@gibsondunn.com>>>; Hershkowitz, Benjamin <BHershkowitz@gibsondunn.com<<mailto:BHershkowitz@gibsondunn.com>>>; Kremer, Paul J. <PKremer@gibsondunn.com<<mailto:PKremer@gibsondunn.com>>>; Krevitt, Josh <JKrevitt@gibsondunn.com<<mailto:JKrevitt@gibsondunn.com>>>; melissa@gillamsmithlaw.com<<mailto:melissa@gillamsmithlaw.com>>

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Subject: RE: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

[External Email]

All:

Although we do not believe it is required given the nature of these amendments, please let us know if you object to a motion.

Best
JS

From: Dat Nguyen

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Sent: Tuesday, January 12, 2021 10:22 AM

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Subject: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

Counsel,

Please find attached KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile.

Best,
Dat

DAT NGUYEN

<image001.png>

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<image005.png>

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